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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JORGE ABRAMOVIS,

Defendant.

2:21-CR-027-RFB-DJA

Preliminary Order of Forfeiture

This Court finds Jorge Abramovs pled guilty to Counts One through Three of a Three-Count Criminal Information charging him in Count One with bank fraud in violation of 18 U.S.C. § 1344(2), in Count Two with monetary transactions in criminally derived property in violation of 18 U.S.C. § 1957; and in Count Three with failure to account for and pay over withholding and F.I.C.A. taxes in violation of 26 U.S.C. § 7202. Criminal Information, ECF No. 46; Arraignment & Plea, ECF No. 49; Plea Agreement, ECF No. 48.

This Court finds Jorge Abramovs agreed to the forfeiture of the property and the imposition of the in personam criminal forfeiture money judgments set forth in the Plea Agreement and the Forfeiture Allegations of the Criminal Information. Criminal Information, ECF No. 46; Arraignment & Plea, ECF No. 49; Plea Agreement, ECF No. 48.

This Court finds, pursuant to Fed. R. Crim. P. 32.2(b)(1) and (b)(2), the United States of America has shown the requisite nexus between property set forth in the Plea Agreement and the Forfeiture Allegations of the Criminal Information and Counts One and Two, to which Jorge Abramovs pled guilty.

The following property and money judgments are (1) any property, real or personal, involved in transactions or attempted transactions in violation of 18 U.S.C. § 1957, or any

property traceable to such property; (2) any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1344 or any property, real or personal, which constitutes or is derived from proceeds traceable to violations of 18 U.S.C. § 1344 or 18 U.S.C. § 1957, specified unlawful activities as defined in 18 U.S.C §§ 1956(c)(7)(A) and 1961(1)(B), or a conspiracy to commit such offenses; (3) any property, real or personal, involved in violations of 18 U.S.C. § 1957, or any property traceable to such property; and (4) any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of a violation of 18 U.S.C. § 1344, affecting a financial institution, or a conspiracy to violate such offense and are subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) with 28 U.S.C. § 2461(c); 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c); 18 U.S.C. § 982(a)(1); 18 U.S.C. § 982(a)(2)(A); and 21 U.S.C. § 853(p):

1. \$257,089.54;
2. \$799.22;
3. a 2021 BMW M850i xDrive Gran Coupe, white in color, with VIN WBAGV8C07MCF00249, bearing Nevada license plate 653M21;
4. real property located at 3726 South Las Vegas Boulevard, Unit 509, Las Vegas, Nevada; and

MORE PARTICULARLY DESCRIBED AS:

PARCEL 1:

UNIT 509 IN BUILDING WEST IN VEER TOWERS, AS SHOWN ON THAT CERTAIN FINAL MAP OF THE VEER TOWERS, A RESORT CONDOMINIUM SUBDIVISION ON FILE IN BOOK 142 OF PLATS, PAGE 42 AND AS SET FORTH IN THE DECLARATION OF COVENANTS, CONDITIONS AND RESTRICTIONS AND RESERVATION OF EASEMENTS FOR VEER TOWERS RECORDED MAY 03, 2010 IN BOOK 20100503 AS INSTRUMENT NO. 0002036, BOTH IN THE OFFICE OF THE COUNTY RECORDER, CLARK COUNTY, NEVADA.

PARCEL 2:

AN ALLOCATED INTEREST AS A TENANT-IN-COMMON IN THE COMMON ELEMENTS OF VEER TOWERS (INCLUDING ANY ANNEXATIONS THERETO), AS SHOWN BY THE MAP AND AS SET FORTH IN THE DECLARATION.

1 PARCEL 3:

2 AN EXCLUSIVE EASEMENT APPURTENANT TO PARCELS 1 AND 2
3 DESCRIBED ABOVE, OVER AREAS DEFINED AND DESCRIBED AS
4 LIMITED COMMON ELEMENTS, IF ANY, ALLOCATED TO
5 PARCELS 1 AND 2 IN THE DECLARATION AND AS SHOWN AND
6 DELINEATED UPON THE MAP REFERRED TO ABOVE.

7 PARCEL 4:

8 NON-EXCLUSIVE EASEMENTS FOR ACCESS, INGRESS, EGRESS,
9 USE AND OTHER PURPOSES ALL DESCRIBED IN THE
10 DECLARATION AND IN THAT CERTAIN (A) DECLARATION OF
11 CENTRAL PLANT EASEMENTS, DATED DECEMBER 01, 2009 AND
12 RECORDED DECEMBER 01, 2009 IN BOOK 20091201 AS
13 INSTRUMENT NO. 0002884 OF OFFICIAL RECORDS, AND AS
14 AMENDED BY THAT CERTAIN FIRST AMENDMENT TO
15 DECLARATION OF CENTRAL PLANT EASEMENTS, DATED
16 JANUARY 07, 2010 AND RECORDED JANUARY 07, 2010 IN BOOK
17 20100107 AS INSTRUMENT NO. 0000577 OF OFFICIAL RECORDS; (B)
18 PARKING AND ACCESS AGREEMENT, DATED APRIL 28, 2010 AND
19 RECORDED MAY 03, 2010 IN BOOK 20100503 AS INSTRUMENT NO.
20 0000515 OF OFFICIAL RECORDS; (C) DECLARATION OF SUPPORT
21 AND ENCROACHMENT EASEMENTS, DATED DECEMBER 01, 2009
22 AND RECORDED DECEMBER 01, 2009 IN BOOK 20091201 AS
23 INSTRUMENT NO. 0002885 OF OFFICIAL RECORDS, AND AS
24 AMENDED BY THAT CERTAIN FIRST AMENDMENT TO
25 DECLARATION OF SUPPORT AND ENCROACHMENT
26 EASEMENTS, DATED JANUARY 07, 2010 AND RECORDED
27 JANUARY 07, 2010 IN BOOK 20100107 AS INSTRUMENT NO. 0000578
28 OF OFFICIAL RECORDS; AND (D) DECLARATION OF LIFE SAFETY
SYSTEMS EASEMENTS, DATED DECEMBER 01, 2009 AND
RECORDED DECEMBER 01, 2009 IN BOOK 20091201 AS
INSTRUMENT NO. 0002886 OF OFFICIAL RECORDS, AND AS
AMENDED BY THAT CERTAIN FIRST AMENDMENT TO
DECLARATION OF LIFE SAFETY SYSTEM EASEMENTS DATED
JANUARY 07, 2010 AND RECORDED JANUARY 07, 2010 IN BOOK
20100107 AS INSTRUMENT NO. 0000579 OF OFFICIAL RECORDS,
AND ALL IMPROVEMENTS AND APPURTENANCES THEREON,
APN: 162-20-714-020.

5. real property located at 3726 South Las Vegas Boulevard, Unit
1803, Las Vegas, Clark County, Nevada, APN 162-20-714-153:

MORE PARTICULARLY DESCRIBED AS:

PARCEL I:

UNIT ONE THOUSAND EIGHT HUNDRED THREE (1803) IN
BUILDING "W" IN VEER TOWERS, AS SHOWN ON THAT CERTAIN
FINAL MAP OF THE VEER TOWERS, A RESORT CONDOMINIUM
SUBDIVISION ON FILE IN BOOK 142 OF PLATS, PAGE 42 (THE
"MAP") AND AS SET FORTH IN THE DECLARATION OF
COVENANTS, CONDITIONS AND RESTRICTIONS AND

1 RESERVATION OF EASEMENTS FOR VEER TOWERS (THE
2 "DECLARATION"), RECORDED MAY 03, 2010 IN BOOK 20100503 AS
3 INSTRUMENT NO. 0002036, BOTH IN THE OFFICE OF THE
4 COUNTY RECORDER, CLARK COUNTY, NEVADA (THE
5 "OFFICIAL RECORDS").

6 PARCEL II:

7 AN ALLOCATED INTEREST AS A TENANT-IN-COMMON IN THE
8 COMMON ELEMENTS OF VEER TOWERS (INCLUDING ANY
9 ANNEXATIONS THEREOF)AS SHOWN BY THE MAP AND AS SET
10 FORTH IN THE DECLARTION.

11 PARCEL III:

12 AN EXCLUSIVE EASEMENT APPURTENANT TO PARCELS ONE (1)
13 AND TWO (2) DESCRIBED ABOVE, OVER AREAS DEFINED AND
14 DESCRIBED AS LIMITED COMMON ELEMENTS, IF ANY,
15 ALLOCATED TO PARCELS ONE (1) AND TWO (2) IN THE
16 DECLARATION AND AD SHOWN AND DELINEATED UPON THE
17 MAP REFFERED TO ABOVE.

18 PARCEL IV:

19 NON-EXCLUSIVE EASEMENTS FOR ACCESS, INGRESS, EGRESS,
20 USE AND OTHER PURPOSES ALL DESCRIBED IN THE
21 DECLARATION AND IN THAT CERTAIN (A) DECLARTION OF
22 CENTRAL PLANT EASEMENTS, DATED DECEMBER 01, 2009 AND
23 RECORDED DECEMBER 1, 2009 IN BOOK 20091201 AS
24 INSTRUMENT NO. 0002884 OF OFFICIAL RECORDS, AND AS
25 AMENDED BY THAT CERTAIN FIRST AMENDMENT TO
26 DECLARATION OF CENTRAL PLANT EASEMENTS, DATED
27 JANUARY 7, 2010 AND RECORDED JANUARY 7, 2010 IN BOOK
28 20100107 AS INSTRUMENT NO. 0000577 OF OFFICIAL RECORDS; (B)
PARKING AND ACCESS AGREEMENT, DATED APRIL 28, 2010 AND
RECORDED MAY 3, 2010 IN BOOK 20100503 AS INSTRMENT NO.
0000515 OF OFFICIAL RECORDS; (C) DECLARATION OF SUPPORT
AND ENCROACHMENT EASEMENTS, DATED DECEMBER 1, 2009
AND RECORDED DECEMBER 1, 2009 IN BOOK 20091201 AS
INSTRUMENT NO. 0002885 OF OFFICIAL RECORDS, AND AS
AMENDED BY THAT CERTAIN FIRST AMENDMENT TO
DECLARATION OF SUPPORT AND ENCROACHMENT
EASEMENTS, DATED JANUARY 7, 2010 AND RECORDED
JANUARY 07, 2010 IN BOOK 20100107 AS INSTRUMENT NO. 0000578
OF OFFICIAL RECORDS; AND (D) DECLARATION OF LIFE SAFETY
SYSTEMS EASEMENTS, DATED DECEMBER 1, 2009 AND
RECORDED DECEMBER 1, 2009 IN BOOK 20091201 AS
INSTRUMENT NO. 0002886 OF OFFICIAL RECORDS, AND AS
AMENDED BY THAT CERTAIN FIRST AMENDMENT TO
DECLARATION OF LIFE SAFETY SYSTEM EASEMENTS DATED
JANUARY 7, 2010 AND RECORDED JANUARY 07, 2010 IN BOOK
20100107 AS INSTRUMENT NO. 0000579, AND ALL IMPROVEMENTS
AND APPURTENANCES THEREON, APN: 162-20-714-153.

(all of which constitutes property)

1 and in personam criminal forfeiture money judgments of \$1,986,737.46 and
2 \$403,906.29, the collected money judgment amount is not to exceed \$1,986,737.46, and that
3 the property will be applied toward the payment of the money judgments.

4 This Court finds that on the government's motion, the Court may at any time enter
5 an order of forfeiture or amend an existing order of forfeiture to include subsequently
6 located property or substitute property pursuant to Fed. R. Crim. P. 32.2(e) and
7 32.2(b)(2)(C).

8 The in personam criminal forfeiture money judgments comply with *Honeycutt v.*
9 *United States*, 137 S. Ct. 1626 (2017).

10 This Court finds the United States of America is now entitled to, and should, reduce
11 the aforementioned property to the possession of the United States of America.

12 NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND
13 DECREED that the United States of America should seize the aforementioned property.

14 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the United
15 States of America recover from Jorge Abramovs in personam criminal forfeiture money
16 judgments of \$1,986,737.46 and \$403,906.29.

17 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED all possessory
18 rights, ownership rights, and all rights, titles, and interests of Jorge Abramovs in the
19 aforementioned property are forfeited and are vested in the United States of America and
20 shall be safely held by the United States of America until further order of the Court.

21 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the United States
22 of America shall publish for at least thirty (30) consecutive days on the official internet
23 government forfeiture website, www.forfeiture.gov, notice of this Order, which shall
24 describe the forfeited property, state the time under the applicable statute when a petition
25 contesting the forfeiture must be filed, and state the name and contact information for the
26 government attorney to be served with the petition, pursuant to Fed. R. Crim. P. 32.2(b)(6)
27 and 21 U.S.C. § 853(n)(2).

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1 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that any individual
 2 or entity who claims an interest in the aforementioned property must file a petition for a
 3 hearing to adjudicate the validity of the petitioner's alleged interest in the property, which
 4 petition shall be signed by the petitioner under penalty of perjury pursuant to 21 U.S.C §
 5 853(n)(3) and 28 U.S.C. § 1746, and shall set forth the nature and extent of the petitioner's
 6 right, title, or interest in the forfeited property and any additional facts supporting the
 7 petitioner's petition and the relief sought.

8 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a petition, if any,
 9 must be filed with the Clerk of the Court, 333 Las Vegas Boulevard South, Las Vegas,
 10 Nevada 89101, no later than thirty (30) days after the notice is sent or, if direct notice was
 11 not sent, no later than sixty (60) days after the first day of the publication on the official
 12 internet government forfeiture site, www.forfeiture.gov.

13 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a copy of the
 14 petition, if any, shall be served upon the Asset Forfeiture Attorney of the United States
 15 Attorney's Office at the following address at the time of filing:

16 Daniel D. Hollingsworth
 17 Assistant United States Attorney
 18 James A. Blum
 19 Assistant United States Attorney
 501 Las Vegas Boulevard South, Suite 1100
 Las Vegas, Nevada 89101.

20 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the notice
 21 described herein need not be published in the event a Declaration of Forfeiture is issued by
 22 the appropriate agency following publication of notice of seizure and intent to
 23 administratively forfeit the above-described property.

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1 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Clerk send
2 copies of this Order to all counsel of record and three certified copies to the United States
3 Attorney's Office, Attention Asset Forfeiture Unit.

4 DATED September 23, 2021.

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8 RICHARD F. BOULWARE, II
9 UNITED STATES DISTRICT JUDGE
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